

**UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF IOWA**

IN RE:) CHAPTER 7
) CASE NO. 23-00484
BDC Group, Inc.)
) Adversary Case No. 25-09029
)
) NOTICE OF AND MOTION FOR
) COMPROMISE OR SETTLEMENT
Debtor(s).) OF CONTROVERSY WITH
) BARNHART CRANE AND RIGGING CO.
)

The undersigned Trustee has entered into a compromise or settlement of controversy and moves the court to approve the following:

The case trustee has brought an Adversary Proceeding, Case No. 25-09029, to recover payments made by the Debtor to Barnhart Crane and Rigging Co. ("Barnhart") totaling \$23,148.00. After discussions, and evaluation of the asserted defense(s), the parties have agreed to settle the legal dispute for \$7,000.00, to be paid upon entry of a Court Order approving this settlement, and the Trustee's agreement to assist with setting aside an Order Entering Default Judgment [ECF 9] and Judgment [ECF 10] as to Barnhart in the Adversary. The Trustee will dismiss, with prejudice, Barnhart from this Adversary Proceeding. Additionally, the Trustee releases Barnhart and its affiliated individuals and entities from any and all claims relating to the Debtor's bankruptcy case, including but not limited to the allegations in this Adversary Proceeding and related Complaint.

In light of the uncertainty of litigation, the legal issues involved, and the additional time and expenses involved in prosecuting the Adversary Proceeding as against Barnhart, the Trustee submits that this recovery as proposed herein is fair and reasonable.

NOTICE IS HEREBY GIVEN that objections must be served on the undersigned trustee, the United States Trustee, 111 7th Avenue SE Box 17, Cedar Rapids, Iowa 52401, debtor(s), debtor(s) counsel and filed with the Clerk of Bankruptcy Court at 111 7th Avenue SE Box 15, Cedar Rapids, Iowa 52401 on or before 4:30 p.m., November 07, 2025.

NOTICE IS FURTHER GIVEN that timely filed objections will be set for hearing by separate notice. If no objections are filed, a separate order will enter.

I hereby certify that on this date a copy of this Notice and Motion was served on the U.S. Trustee, debtor(s), debtor(s) counsel, and all creditors or other parties-in-interest who have filed a request for notice pursuant to Local Bankruptcy Rule 2002-1(b).

DATED: October 16, 2025.

/s/ Renee K. Hanrahan
Renee K. Hanrahan, Chapter 7 Trustee
P.O. Box 1088
Cedar Rapids, IA 52406-1088
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NOTE: Service List/Clerk's Mailing Matrix attached